4.0 EMISSIONS INVENTORY - PERMIT ACTIONS WITHIN STUDY BOUNDARY

The purpose of the cumulative impacts analysis is to present the total impacts from the proposed project, along with all existing anthropogenic sources within the selected source domain as of December 31, 1998, and other reasonably foreseeable development. Four pollutants, PM₁₀, PM_{2.5}, SO₂, and NO_x, are inventoried for the cumulative impacts analysis. Sources within the source domain (shown on Figure 3.1) as determined by BLM in consultation with the cooperating parties are included.

This section describes emissions from sources installed within the source domain as evidenced by records collected from the Wyoming DEQ permit files. The source inventory prepared for the Continental Divide EIS was used as a starting point. Any changes in status of sources on that list and new sources subsequent to that were added to or subtracted from the source inventory.

Actual emissions are inventoried for the permitted sources in existence as of December 31, 1998, which have operational histories documented in the Wyoming DEQ inventory record for a minimum of a one-year period. Potential to emit is used for all other permitted sources including those in the category of reasonably foreseeable development (RFD).

4.1 Inclusions - July 1995 Through Post-1998

The inclusion criteria for sources in operation between July 1995 and December 1998 are as follows:

- Source is located within the source domain boundary.
- Source was issued a permit after June 1, 1993.
- Source began operating after July 1, 1995.
- Source began operating before January 1999.

For a list of these sources, along with their corresponding emissions, see Appendix E. The source locations are shown in Figure 4.1. (Note that if the source meets all but the last criterion, it is categorized as a RFD source and still included in this category.)

The short-term and long-term emissions from all the permit actions are summarized in Tables 4.1 and 4.2, respectively. Emission increases and decreases are shown separately.

TABLE 4.1 SHORT-TERM EMISSIONS (lb/hour)

	PM _{2.5}	PM ₁₀	NO _x	SO ₂
Permit Actions - Increases	99.94	228.97	720.95	428.59
Permit Actions - Decreases	(34.11)	(74.18)	(258.22)	(127.08)

TABLE 4.2 LONG-TERM EMISSIONS (tons/year)

	PM _{2.5}	PM ₁₀	NO _x	SO ₂
Permit Actions - Increases	251.59	599.18	2,952.27	1,621.04
Permit Actions - Decreases	(149.42)	(324.92)	(1,130.99)	(556.60)

4.2 Exclusions - July 1995 Through Post-1998

Sources within the study boundary may be excluded from the analysis for several reasons, including startup prior to July 1, 1995; no NO_x , SO_2 , PM_{10} , and/or $PM_{2.5}$ emissions; and expiration of permit. These sources are listed in Appendix F.

4.3 Naughton Emissions Decrease

Ultra Petroleum negotiated with PacifiCorp to purchase a portion of a low- NO_x burner for Naughton Unit 3. PacifiCorp expects the actual control benefit from the low- NO_x burners to be about 2,000 tons per year.

The Naughton boiler is modeled as a point source. The location is shown in Figure 4.1, and stack parameters are provided in Appendix G.

There will be two separate CALPUFF model runs to evaluate the benefit of the Naughton Unit 3 NO_x emission control to the Class I areas and the area local to Naughton. The first run will be at the baseline (i.e., 1995) emissions level of 6,033.3 tons per year and the second at 4,033.3 tons per year.